

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JANE DOE 1, *et al*,

Plaintiffs,

v.

BAYLOR UNIVERSITY,

Defendant.

§ Civil Action No. 6:16-CV-00173-RP

§

§

§ *Consolidated with*

§

§ 6:17-CV-228-RP

§

§ 6:17-CV-236-RP

§

DECLARATION OF RYAN H. NEWMAN

1. My name is Ryan H. Newman, and I am an attorney at Thompson & Horton LLP, which represents Baylor University (“Baylor”) in the above captioned matter. I have practiced law in the State of Texas since 2007. I am over 18 years of age, of sound mind, and am fully competent to testify to the matters stated in this declaration based upon my personal knowledge.
2. I have managed e-discovery for Thompson & Horton for the above-captioned case since January 2019.
3. Following receipt of Court Order 1090, I directed e-discovery personnel at PricewaterhouseCoopers (“PWC”) to prepare for production to Plaintiffs’ counsel copies of all documents that Baylor produced or logged in this litigation from the following sources: Baylor material that Pepper collected during its Title IX investigation at Baylor, Pepper’s internal law firm files relating to Baylor, and United Lex materials produced by Baylor.
4. Pursuant to Court Order 1090 and the Report and Recommendation of the Special Master (Doc. 1082), Baylor produced to Plaintiffs the entire Pepper Hamilton universe of documents on March 31, 2023. All of this material has either a “PH” or “PH2” bates label.
5. Although Baylor has worked diligently to comply with the Court’s orders and has engaged in quality control processes, due to the large volume of production and the use of zipped and compressed files, there is the remote possibility of the occurrence of a technical issue during the zipping, compressing, or transmittal of the production. If Plaintiffs’ counsel identifies a technical issue with a document or a gap in metadata, Baylor will immediately address any unexpected technical issues.
6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Ryan H. Newman
Ryan H. Newman
3/31/2023
Date